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13 ANZA TECHNOLOGY, INC.

14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Anza Technology, Inc.,

17 Plaintiff,

18 v.

19 ARRIS Group, Inc.,

20 Defendant.

Case No. '16CV1261 AJB JLB

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

21 Plaintiff Anza Technology, Inc. ("Anza" or "Plaintiff"), by and through its
22 undersigned counsel, complains and alleges against Defendant ARRIS Group, Inc.
23 ("Defendant") as follows:

24 **NATURE OF THE ACTION**

25 1. This is a civil action for infringement of a patent arising under the
26 laws of the United States relating to patents, 35 U.S.C. § 101, *et seq.*, including,
27 without limitation, 35 U.S.C. §§ 271, 281. Plaintiff Anza seeks a preliminary and
28 permanent injunction and monetary damages for patent infringement.

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5. Upon information and belief, certain of the products manufactured by or for Defendant have been and/or are currently designed and/or offered for sale by Defendant through an in-house sales and marketing team operating out of San Diego, California.

PARTIES

6. Plaintiff Anza is a corporation organized and existing under the laws of the State of California with an office and principal place of business at 4121 Citrus Avenue, Suite 4, Rocklin, California 95677. Anza is a designer, manufacturer and seller of bonding tools, ESD tools and other products directed to the manufacture and assembly of electronics, in particular the bonding of electrostatic-sensitive devices.

7. Upon information and belief, Defendant is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 3871 Lakefield Drive, Suwanee, Georgia 30024. In addition, Defendant maintains an office at 6450 Sequence Drive, San Diego, California 92121.

THE ACCUSED PRODUCTS

8. The Defendant's accused products for purposes of the asserted patents include but are not limited to its electronics hardware products that utilize integrated circuit chips that were manufactured and mounted on printed circuit boards using a "flip chip" bonding process and sold under the "ARRIS" brand or as manufactured and sold under other brands (the "Accused Products").

9. Plaintiff is informed and believes and thereupon alleges that Defendant designs, manufactures and/or assembles or imports products that depend on high density integrated circuit (“IC”) chips that are manufactured and mounted on printed circuit boards using a “flip chip” bonding process that require special electrostatic discharge (“ESD”) handling in the Accused Products’ assembly process.

1 10. Plaintiff is informed and believes and thereupon alleges that
2 Defendant specifies that its Accused Products are manufactured and/or assembled
3 to certain standards of ESD controls as published by ANSI, JEDEC, the IEC and/or
4 the ESDA.

5 **THE ASSERTED PATENTS**

6 11. On October 24, 2006, the United States Patent and Trademark Office
7 (“USPTO”) duly and legally issued United States Patent No. 7,124,927 B2 entitled
8 “FLIP CHIP BONDING TOOL AND BALL PLACEMENT CAPILLARY” (“the
9 ’927 patent”). Steven F. Reiber is the patent’s sole named inventor and Plaintiff is
10 owner, by assignment, of the entire right, title and interest in and to the ’927 patent
11 and vested with the right to bring this suit for damages and other relief. A true and
12 correct copy of the ’927 patent is attached hereto as Exhibit “A.”

13 12. On June 24, 2008, the USPTO duly and legally issued United States
14 Patent No. 7,389,905 B2 entitled “FLIP CHIP BONDING TOOL TIP” (“the ’905
15 patent”). Steven F. Reiber is the patent’s sole named inventor and Plaintiff is
16 owner, by assignment, of the entire right, title and interest in and to the ’905 patent
17 and vested with the right to bring this suit for damages and other relief. A true and
18 correct copy of the ’905 patent is attached hereto as Exhibit “B.”

19 **COUNT ONE**

20 **INFRINGEMENT OF THE ’927 PATENT BY DEFENDANT**

21 13. Plaintiff re-alleges and incorporates by reference each of the
22 allegations set forth in paragraphs 1 through 12 above.

23 14. Defendant has knowledge of infringement of the ’927 patent since at
24 least the filing of this complaint.

25 15. The Accused Products utilize a flip chip bonding technique during
26 manufacture and/or assembly. Flip chip bonding is used for packaging and
27 mounting integrated circuit devices utilized in the Accused Products utilizing
28 dissipative materials during handling so as to reduce ESD damage.

1 16. Flip chip bonding in the manner described in claim 16 of the '927
2 patent has become the standard for mounting ESD-sensitive devices in order to
3 decrease parasitic resistance, inductance, and capacitance. The method of claim 16
4 of the '927 patent to reduce damage to ESD-sensitive devices is reflected in a
5 number of manufacturing standards, including, *e.g.*, the ANSI ESD S20.20
6 standard. By way of example, the ANSI standard specifies that current state of the
7 art manufacturing techniques involving ESD-sensitive devices require the use of
8 tools that utilize dissipative materials, *i.e.*, materials that ANSI defines as having a
9 resistance value between 1×10^4 and 1×10^{11} ohms surface or volume resistance.
10 Such specification from the standard is within the range set forth in the '927 patent.
11 Plaintiff believes and alleges that other applicable ESD standards require
12 substantially similar resistance values.

13 17. Plaintiff is informed and believes and thereon alleges that Defendant
14 manufactures and assembles the Accused Products, or contracts with others to
15 manufacture and assemble the Accused Products, in compliance with one or more
16 of these ESD standards.

17 18. In addition, Plaintiff is informed and believes and thereon alleges that
18 during manufacture and assembly of the Accused Products, Defendant and/or its
19 contractors, utilize conductive adhesives, such as solder, as packaging
20 interconnects. These packaging interconnects are formed over the wafer in the
21 form of bumps or balls, spherical in shape, which bumps are electrically and
22 thermally conductive. The packaging interconnects – or solder balls – are heated
23 and pressed against die or substrate pads to form a conductive bump or contact
24 point between the die and the flex.

25 19. In addition, Plaintiff is informed and believes and thereon alleges that
26 the Accused Products use chipsets that utilize mounting systems, including but not
27 limited to ball grid array(s) that are susceptible to damage resulting from ESD.
28 Following proper manufacturing techniques, the Defendant uses assembly tools

1 that feature the infringing dissipative and resistive technology taught by the
2 Asserted Patents.

3 20. The Accused Products, alone or in combination with other products,
4 directly or alternatively, under the doctrine of equivalents, therefore infringe each
5 of the limitations of independent claim 16 of the '927 patent in violation of 35
6 U.S.C. § 271(g) when Defendant imports into the United States or offers to sell,
7 sells, or uses within the United States a product which is made by the processes
8 described above.

9 **COUNT TWO**

10 **INFRINGEMENT OF THE '905 PATENT BY DEFENDANT**

11 21. Plaintiff re-alleges and incorporates by reference each of the
12 allegations set forth in paragraphs 1 through 12 above.

13 22. Defendant has knowledge of infringement of the '905 patent since at
14 least the filing of this complaint.

15 23. The Accused Products utilize a flip chip bonding technique during
16 manufacture and/or assembly. Flip chip bonding is used for packaging and
17 mounting integrated circuit devices utilized in the Accused Products utilizing
18 dissipative materials during handling so as to reduce ESD damage.

19 24. Flip chip bonding in the manner described in claims 53 and 55 of the
20 '905 patent has become the standard for mounting ESD-sensitive devices in order
21 to reduce parasitic resistance, inductance, and capacitance. The methods of claims
22 53 and 55 of the '905 patent are reflected in a number of manufacturing standards,
23 including, *e.g.*, the ANSI ESD S20.20 standard. By way of example, the ANSI
24 standard specifies that the current state of the art manufacturing techniques
25 involving ESD sensitive devices utilize tools with dissipative materials, *i.e.*,
26 materials that ANSI defines as having a resistance value between 1×10^4 and $1 \times$
27 10^{11} ohms surface or volume resistance. Such specification from the standard is
28 within the range set forth in the '905 patent. Plaintiff believes and alleges that

1 other applicable ESD standards require substantially similar resistance values.

2 25. Plaintiff is informed and believes and thereon alleges that Defendant
3 manufactures and assembles the Accused Products or contracts with others to
4 manufacture and assemble the Accused Products in compliance with one or more
5 of these ESD standards.

6 26. In addition, Plaintiff is informed and believes and thereon alleges that
7 Defendant manufactures and assembles the Accused Products utilizing conductive
8 adhesives per the method described by claim 53 and 55 of the '905 patent.
9 Conductive adhesive, such as solder, is used as packaging interconnects in the
10 Accused Products. The packaging interconnects are formed over the wafer in the
11 form of bumps or balls, spherical in shape, which bumps are electrically and
12 thermally conductive. The packaging interconnects – or solder balls – are heated
13 and pressed against die or substrate pads to form a conductive bump or contact
14 point between the die and the flex.

15 27. In addition, Plaintiff is informed and believes and thereon alleges that
16 the Accused Products use chipsets that utilize mounting systems, including but not
17 limited to ball grid array(s) that are susceptible to damage resulting from ESD.
18 Following proper manufacturing techniques, the Defendant uses assembly tools
19 that feature the infringing dissipative and resistive technology taught by the
20 Asserted Patents.

21 28. The Accused Products, alone or in combination with other products,
22 directly or alternatively under the doctrine of equivalents infringe each of the
23 limitations of independent claims 53 and 55 of the '905 patent in violation of 35
24 U.S.C. § 271(g) when Defendant imports into the United States or offers to sell,
25 sells, or uses within the United States a product which is made by the processes
26 described above.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiff prays for relief and judgment as follows:

1. That Defendant has infringed the Patents-in-Suit;
2. Compensation for all damages caused by Defendant's infringement of the Patents-in-Suit to be determined at trial;
3. A finding that this case is exceptional and an award of reasonable attorneys fees pursuant to 35 U.S.C. § 285;
4. Granting Plaintiff pre-and post-judgment interest on its damages, together with all costs and expenses; and,
5. Awarding such other relief as this Court may deem just and proper.

HANDAL & ASSOCIATES

Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick

Gabriel G. Hedrick
Attorneys for Plaintiff
Anza Technology, Inc.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all claims.

HANDAL & ASSOCIATES

Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick

Gabriel G. Hedrick
Attorneys for Plaintiff
Anza Technology, Inc.